



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

01/02/2013

CONFIDENTIAL BUSINESS INFORMATION

MEMORANDUM

SUBJECT: CEI at Corn LP
Clarion, Iowa
Administrative ID Number: IAR000517458

FROM: Edwin G. Buckner, P.E.
Compliance Officer
AWMD/WEMM

TO: File

On November 7-8, 2012, Glenn Cherry, an EPA SEE inspector conducted a compliance evaluation inspection (CEI) at Corn LP. This inspection was requested because a series of fires and the Wright County solid waste transfer station were suspected to have started because of material received from Corn LP.

It appears the material responsible for these fires was "combustor tram." Combustor tram results from injecting limestone, along with the coal, into a fluidized bed boiler. The limestone is used to control air pollution. The resulting material contains calcium oxide which, when contacted with water, will undergo an exothermic reaction of such energy that it can cause nearby combustible materials to ignite. In this case, a truck load of combustor tram also contained cardboard.

Under most circumstances, the EPA would consider waste such as this to be a D001 ignitable hazardous waste, but 40 CFR 261.4(b) provides exemption for various solid wastes from the definition of hazardous waste. Section 261.4(b)(4) exempts "Fly ash waste, bottom ash waste, slag waste, and flue gas emission control waste, generated primarily from the combustion [sic] of coal or other fossil fuels . . ." The combustor tram is a flue gas emission control waste and therefore exempt from the hazardous waste regulations.

Corn LP claimed all information in the CEI report as confidential business information (CBI). Since this memorandum discusses information from that report, it must also be handled as CBI. In an effort to maintain the integrity of the report's CBI status, the EPA has elected to not send a copy of the report or this memorandum to the facility. Absent additional information, the EPA plans no further action on this matter.

AWMD/WEMM/Buckner/mrw:12/21/2012:H:AWMD/WEMM/Cores13:CEI.Corn LLP Memo.doc

WEMM	WEMM
<i>Buckner</i>	<i>Koesterer</i>
01/02/2013	01/02/2013



Printed on Recycled Paper